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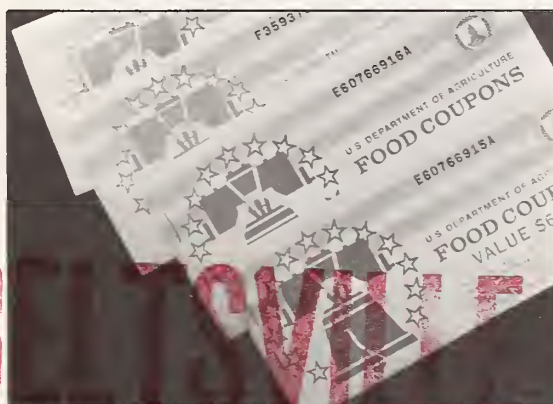
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Changes in the Food Programs



Major changes in the Food Stamp and Child Nutrition Programs are taking effect this fall as a result of the Omnibus Reconciliation Act of 1981. In an interview, FNS Administrator G. William Hoagland discusses the changes. **Pages 2, 6**

Pennsylvania's Direct Delivery Project



Thousands of federal dollars are being saved as a result of a new food stamp delivery system in Pennsylvania. Participants say the new system benefits them, too. **Page 11**

USDA Studies the Commodity System



A study in 90 schools nationwide will evaluate cost effective ways of improving the commodity system. The study begins this fall. **Page 14**

WIC on the Standing Rock Reservation



For 3 years, the Standing Rock Sioux Reservation has operated its own WIC program. A recent study shows the program has helped alleviate anemia among mothers and children. **Page 16**

HIGHLIGHTS OF THE OMNIBUS RECONCILIATION ACT OF 1981

On August 13, President Reagan signed the Omnibus Reconciliation Act of 1981. The Act calls for significant reductions in the growth of federal spending and is a cornerstone of the Administration's Economic Recovery Plan, which also includes tax relief and the reduction of federal regulations.

The Reconciliation Act, Public Law 97-35, makes major changes in the Food Stamp and Child Nutrition Programs. For fiscal year 1982, the changes are expected to save more than \$3 billion in federal funds.

CHILD NUTRITION

Under the new law, the emphasis in child feeding programs shifts toward directing more benefits to needy children. The programs continue to provide subsidies for meals to children from all income levels, but support for meals which go to non-needy children is reduced.

While this increases local costs for providing lunches to non-needy children, USDA is reviewing program changes that could help compensate by enabling schools and institutions to cut the cost of producing meals. For example, the Department is examining options for reducing regulatory burdens and providing schools and institutions with more flexibility concerning meal pattern requirements.

Specifically, the law provides:

Reduced support for paid meals.

The new law reduces cash subsidies and commodity support for meals served to children who pay the full price for their meals in the National School Lunch Program (NSLP), School Breakfast Program (SBP), and Child Care Food Program (CCFP).

Paid meals—meals served to children from families with incomes in excess of 185 percent of poverty, or \$15,630 annually for a family of four—get a reduced level of federal reimbursement this year.

See the chart on page 3 for reimbursement levels for paid meals in most schools and institutions.

Decreased support for reduced-price meals. The new law reduces cash subsidies and commodity support for meals served to children who pay reduced prices for their school meals in the National School Lunch Program (NSLP), School Breakfast Program (SBP), and the Child Care Food Program (CCFP).

Federal support for reduced-price meals—meals served to children from homes with incomes between \$10,990 and \$15,630 annually for a family of four—is cut by about one-fifth the level it would have been next year under the previous law.

The new law sets the maximum

charge for reduced-price lunches at 40 cents. Last year the maximum charge was 20 cents.

See the chart on page 3 for reimbursement levels for reduced-price meals in most schools and institutions. Rates are slightly higher for school meals in areas with 60 percent or more meals served free or at reduced price.

Tightened income eligibility. The new law lowers the upper income limit for families of children eligible for reduced-price meals.

In order to protect benefits for the neediest at the same time, the law makes only a slight decrease in the income eligibility limits for free meals, which go to children from the poorest families.

The maximum income limit for reduced-price meal eligibility decreases under the new law from 195 percent of the Office of Management and Budget's poverty line plus a standard deduction, to 185 percent of the poverty line with no deduction. This means that for a family of four, the maximum income allowed is \$15,630 annually, instead of the \$17,440 it would have been under the previous law.

Eligibility for free meals is set at a flat 130 percent of the poverty line, instead of the limit under the old law of 125 percent of poverty plus a standard deduction. This means that for a family of four eligibility for free lunches is \$10,990 instead of \$11,520 annually.

Required verification and simplified program rules.

The law requires schools and institutions to verify—in accordance with regulations prescribed by the Secretary of Agriculture—the information contained in the free and reduced-price meal applications submitted by parents. Starting this year, the applications for free and reduced-price meals require social security numbers of all adult household members.

In addition, letters sent home to parents with the application include only the eligibility levels for reduced-price, not for free meals. This will better target benefits on the basis of actual need, since investigations have shown that some households were intentionally

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understating their income to qualify their children for free lunches. Public releases of the information will include eligibility levels for both free and reduced-price meals.

To simplify program administration, the law drops detailed cost accounting as a factor in federal reimbursement. Previously, to get federal reimbursement, schools and institutions had to keep detailed records of their costs.

The new law also instructs USDA to make changes in other program requirements in order to save on costs of running child feeding programs at the local level.

Changes in the category of areas eligible to administer the Summer Food Service Program. The new law retains the Summer Food Service Program, but now requires that the program operate in areas in which 50 percent of the children served meet the income eligibility criteria for free and reduced-price lunches. Previously, the program operated in areas where at least one-third of children served were eligible for free and reduced-price meals.

The law also makes changes in

eligibility requirements for summer program sponsors. Sponsors must now be either public or private nonprofit school food authorities or local, municipal, or county governments. Residential camps are still eligible, but the law eliminates all other private sponsors that are not schools.

Changes in the Child Care Food Program. In addition to changing reimbursement rates for paid and reduced-price meals, the new law:

- Limits meal reimbursement in child care centers to children 12 years of age or younger except for handicapped children, with an amendment allowing migrant children 15 years of age and younger to participate.

- Allows child care institutions to serve no more than two meals and one snack per child per day.

- Lowers family and group day care home rates of reimbursement for meals by 10 percent.

- Requires the Secretary of Agriculture to reduce rates of reimbursement for the administrative expenses of organizations that sponsor day care homes. The law requires the Secretary to lower rates so as to achieve a 10 percent

savings in the amount provided to sponsoring organizations for their administrative expenses.

- Eliminates reimbursement for meals and supplements (snacks) served to children of family day care home providers whose annual income exceeds 185 percent of the Office of Management and Budget poverty guidelines.

- Limits the participation of Title XX sponsors that operate on a "for profit" basis to such institutions that serve at least 25 percent of children receiving Title XX benefits.

- Eliminates the "tiering" system of reimbursements. Under this system, child care centers or sponsoring organizations are placed in one of three tiers, depending on the percentage of children served who are eligible for free or reduced-price meals. The tier in which a center or sponsoring organization is placed determines its rates of reimbursement for all meals.

Under the new law, reimbursements are made according to the actual number of children eligible for the different categories of reimbursement—paid, reduced-price, and free.

A comparison of 1981 and 1982 meal reimbursement levels and income limits for free and reduced-price meals

	1982 under new law (Sept. 1981-June 1982)	Under former law (July 1981-Sept. 1981)	1981 rates (Jan. 1981-June 1981)
Paid lunch or supper	10.5¢ cash 11.0¢ commodities 21.5¢ meal total	17.75¢ cash 14.75¢ commodities 32.50¢ meal total	16.0¢ cash 13.5¢ commodities 29.5¢ meal total
Paid breakfast:	8.25¢ per meal	16.25¢ per meal	14.75¢ per meal
Reduced-price lunch or supper:	10.50¢ basic 58.75¢ special 11.00¢ commodities 80.25¢ total	17.75¢ basic 71.50¢ special 14.75¢ commodities 104.00¢ total	16.00¢ basic 63.50¢ special 13.50¢ commodities 93.00¢ total
Reduced-price breakfast	28.50¢ per meal	46.75¢ per meal	42.50¢ per meal
	1982 under new law (Aug. 1981-June 1982)	Under former law (July 1981-Sept. 1981)	1981 limits (Jan. 1981-June 1981)
Income limit for reduced-price meals:	\$15,630	\$17,440	\$15,490
For free meals:	\$10,990	\$11,520	\$10,270

Nutrition education and training. The new law reduces funding authority for the Nutrition Education and Training Program (NET) to \$5 million.

Increased funding for WIC. In fiscal year 1982, there is an increase rather than a reduction in funding authority for the Special Supplemental Food Program for Women, Infants and Children (WIC). The law authorizes \$1.017 billion for fiscal year 1982, \$1.060 billion for fiscal year 1983, and \$1.126 billion for fiscal year 1984. Actual funding for the WIC program is subject to usual appropriation procedures.

Limiting the Special Milk Program. The new law limits the Special Milk Program to schools and institutions without other federally subsidized food programs.

Previously, schools and child care institutions could take part in the Special Milk Program as well as the National School Lunch, School Breakfast, and Child Care Food Programs. Under the new law, institutions can only take part in the Special Milk Program if they are not getting federal subsidies for other food programs.

Eliminating food service equipment assistance. The new law eliminates the Food Service Equipment Assistance Program. Since 1967, more than \$250 million in federal funds has been used to initiate and upgrade school food service. Now that this task is largely completed, state and local funds will be used to upgrade equipment when necessary.

Eliminating high-tuition schools. The new law eliminates from federally subsidized food programs nonprofit schools with annual tuition over \$1,500.

FOOD STAMPS

Changes in the Food Stamp Program under the Reconciliation Act are designed to slow the growth of program spending. Under the new law, for example, benefits are pro-rated to new re-

cipients based on when they actually apply. People will no longer get a full month's worth of food stamps regardless of the time of the month they apply.

The law also better targets program benefits to the needy by limiting eligibility to households whose gross (or total) income is at or below 130 percent of the poverty line. In addition, the law strengthens anti-fraud provisions and provides for recoupment of benefits received through recipient error.

The Reconciliation Act does not reauthorize the Food Stamp Program. A provision to reauthorize the program is included in the Farm Bill. Following are specifics of the changes contained in the Reconciliation Act:

Gross income eligibility standard. The new law sets new income eligibility standards, based on gross (or total) income, for all households except those containing elderly or disabled members. To qualify for food stamps, a family's gross income must be no more than 30 percent above the poverty level.

For households with elderly or disabled members, eligibility continues to be based on net income (income after deductions).

Adjustments of deductions. The law freezes the levels of both the standard deduction and the dependent care/excess shelter deduction at current levels until July 1, 1983. At that time, they will be updated based on changes in the Consumer Price Index for the 15 months ending March 31, 1983. They will be updated again in October 1984 and then annually thereafter. The Consumer Price Index to be used in these updates will no longer contain the homeownership component.

Earned income deduction. The law lowers the earned income deduction for working households from 20 percent to 18 percent.

Repeal of increases in dependent care deduction for working adults and medical deductions for the elderly and disabled. The law repeals two increases in de-

ductions that were enacted into law by Public Law 96-249 and were scheduled to become effective October 1, 1982. The provisions would have created a separate dependent care deduction of up to \$90 per month for working adults. They also would have liberalized the medical deduction for the elderly and disabled by: allowing elderly or disabled people to deduct medical costs exceeding \$25 rather than \$35; and by including in the deduction the medical expenses of spouses who were not elderly or disabled.

Adjustment of the Thrifty Food Plan. The law provides for adjustment of the Thrifty Food Plan on the following dates: April 1982, July 1983, and October 1984. These adjustments will be based on changes in the Consumer Price Index (CPI) during the preceding 15 months. Then, in October 1985 and each October thereafter, the adjustment will be based on a 12-month cost change.

USDA uses the Thrifty Food Plan in determining food stamp allotments for various size households.

Strikers. The law prohibits strikers from joining the program. In situations where a household would have been eligible when a member went on strike, the household would retain eligibility, but it could not receive an increase in benefits as a result of the strike.

Boarders. The law prohibits boarders from applying for the program as separate households.

Family unit requirement. The law requires parents under 60 years of age and children who live together to be considered as one household.

Pro-rating first month benefits. The law requires pro-rating of food stamp allotments for the initial month a household participates in the program. If a household does not participate for the full month, it will receive only a portion of that month's allotment.

Disqualification penalties for fraud and misrepresentation. The law expands the base for disquali-

cation to include any action that violates a state statute related to abuse of the Food Stamp Program. It also provides for disqualification of the household member for 6 months for the first offense, 1 year for the second, and permanently for the third.

It prohibits any increase in benefits to a household with a disqualified member, if the increase is a result of the disqualification. The law requires that information on disqualified individuals be forwarded to the Secretary of Agriculture for establishment of a tracking system.

Improved recovery of overpayment. The law permits states to collect overissued benefits in non-fraud cases by reducing future allotments to the household. Such collections are limited to 10 percent of the household's monthly allotment or \$10 per month, whichever results in faster collection.

States' share of collected claims. Currently where over-issuances are determined by court action or administrative hearings, states can retain 50 percent of the collected claims. The new law allows states to retain 25 percent of collected claims for all other overissuances, except those resulting from state agency errors.

Waiving and offsetting claims. The law gives the Secretary of Agriculture authority to collect claims due to the federal government (for example, monies owed because of loss or error) by reducing states' administrative funds. The Secretary can also waive such claims.

Periodic reporting and retrospective accounting. The law requires states to implement a periodic reporting and retrospective accounting system by October 1983. The previous law made retrospective accounting optional for states.

Most households will have to make monthly reports of their financial circumstances. Exempted from this requirement are migrants and households consisting

entirely of elderly or disabled people.

Under retrospective accounting, once a household is certified for food stamps, benefits will be calculated on the basis of the family's financial circumstances during a previous month. Benefits will no longer be calculated on the basis of the family's financial circumstances during the month they apply.

If the use of retrospective accounting causes a serious hardship on newly applying households, a supplemental allotment may be issued.

Migrant households are excluded from this requirement.

Outreach. The law eliminates the outreach requirement that states must inform low-income households about the Food Stamp Program. It prohibits states from using federal funds for this activity. The law retains requirements concerning bilingual personnel and materials.

Puerto Rico block grant. The law provides that effective July 1, 1982, the Commonwealth of Puerto Rico will receive a block grant not to exceed \$825 million yearly. The block grant is to finance 100 percent of the food assistance expenditures for needy persons and 50 percent of the related administrative costs. To qualify for this financial assistance, the Commonwealth must submit an annual plan to be approved by the Secretary of Agriculture.

SSI cash-out. The Supplemental Security Income (SSI) portion of the law includes a provision allowing those states which are currently considered SSI cash-out states to remain as such. SSI cash-out is the system whereby the value of food stamp benefits are provided in the supplemental payments states give to SSI recipients.

To retain SSI cash-out status, a state's supplemental payments in December 1980 must have included the bonus value of food stamps. In addition, the state must have incorporated this bonus value into the payment continuously since December 1980.

IMPLEMENTATION

USDA's Food and Nutrition Service is moving promptly to put into effect the changes contained in the Reconciliation Act. Some of the changes are already in effect.

Major changes in food stamp eligibility rules and benefits began taking effect October 1. Regulations containing these changes were issued in September. The regulations:

- remove higher income households from the program, or reduce their benefits;
- drop strikers from the program;
- pro-rate the initial month's benefits from the date of application;
- delay cost of living adjustments in the Thrifty Food Plan; and
- delay and reduce cost of living adjustments in the deductions allowed from gross income in determining benefits.

Three additional rulemaking packages will follow. Proposed rules on fraud penalties and claims collection procedures are being issued for public comment this fall, and final rules are expected early next year. Proposed rules for establishing retrospective accounting and monthly reporting systems will be ready for comment by the end of the year; legislation requires that these rules be in place by October 1983. Regulations governing the new block grant for Puerto Rico will be issued later this year—to be in effect by July 1982.

Several of the child nutrition changes were effective immediately:

- the new reimbursement levels for meals;
- the new income poverty guidelines;
- the maximum rate for reduced-price meals; and
- new application procedures for free and reduced-price meals.

Regulations are being issued according to the timetable set by the law.

For more information, write:

Food and Nutrition Service
U.S. Department of Agriculture
Washington, D.C. 20250

AN INTERVIEW WITH FNS ADMINISTRATOR HOAGLAND

Following is an interview with G. William Hoagland, Administrator of the Food and Nutrition Service. The interview focuses on changes in the Food Stamp Program and Child Nutrition Programs as a result of the Omnibus Reconciliation Act of 1981. In addition, Mr. Hoagland discusses the future of the Food Stamp Program, federal/state relationships, and the role of commodities in school food programs.

Mr. Hoagland has been with FNS since March 1980. He previously worked for 5 years in the Congressional Budget Office, Division of Human Resources and Community Development. Prior to that he worked for the Food and Nutrition Service's economic analysis and program evaluation staff.

Mr. Hoagland has dealt with poverty-related nutrition issues since his graduate work in agricultural economics at Pennsylvania State University where he completed his master's degree in 1972. He also holds a B.S. in agricultural economics from Purdue University.

Q What do you think is the most significant change in the Food Stamp Program under the Reconciliation Act?

A Probably one of the most important changes from a policy perspective is the elimination of the Food Stamp Program in Puerto Rico and the establishment of a general food assistance grant in its place. We will simply be giving a block of money to Puerto Rico, starting in July of next year, and they will in turn design their own food assistance program.

This flags the beginning of a new direction in food assistance policy—a policy designed to provide state and local governments with the maximum amount of flexibility for operating their own programs.

I also think it is significant for another reason: it raises the basic question of whether or not the Food Stamp Program is truly a food assistance program or an income maintenance program.

I worked with welfare reform proposals during the Nixon years and during the Carter years and with various spin-offs of all those proposals. It is my opinion that block grant proposals simply represent a continuation of these earlier welfare reform debates.

The Food Stamp Program is a major assistance program for a vast majority of low-income people. I question whether or not that assistance has to be in the form of food stamp script. I question the basic premise of the Food Stamp

Program now—particularly with the elimination of the purchase requirement—whether or not people are really increasing their food consumption over and above what they would do if they simply received money.

It used to be that people had to commit a certain portion of their own money to food purchases because they had to “buy” their food stamps. This purchase requirement formed a guarantee that at least the amount of the purchase requirement would be dedicated to food purchases. It underscored the fact that the Food Stamp Program was a program designed to get people to buy food—a nutrition program, a food assistance program.

When we eliminated the requirement that people put up some of their own money for food stamps, we changed the focus of the program. We changed from a food assistance program to an income maintenance program; a program that provides people with basic income assistance and frees them to spend their money as they choose.

Therefore, I think the question, as we go into the decade of the '80s is: “How do food stamps relate to all the other forms of assistance aimed at low-income people—AFDC, Energy Assistance, SSI?”

The direction I see the Administration headed is program consolidation—not necessarily just eliminating the Food Stamp Program and giving the money to the states—but blocking a number of income assistance programs, and food stamps could be one of them.

At the same time, I think there are major questions to be addressed with block grants. There are major issues as to the distribution of funds. There are major issues as to the administration and accountability of block grants.

I think it's a healthy environment of questioning that we're moving into. I look forward to the debate. I'm not going to take any position right now on which way it should come out. But I am convinced, now more than ever, there is a serious need for national welfare reform, and block grants may be one approach.



Q Do you think there will be additional proposals to limit eligibility for the Food Stamp Program or cut back on benefits in order to hold down food stamp spending?

A I think it's fair to say that in certain instances there are things in food stamp legislation under the Reconciliation Act which we oppose.

For instance, there is a provision that exempts elderly, blind and disabled households from the income cut-off that is set at 30 percent above the poverty line. That creates all kinds of problems. Caseworkers have two different eligibility standards, different determinations of family composition. We will probably come back to Congress and ask them to reconsider this provision.

To suggest that there won't be additional proposals for modifications in the Food Stamp Program in 1983 and '84 wouldn't be honest. Yes, there probably will be some changes. And yes, too—as it relates to the overall fiscal policy of this Administration—should it turn out that we are still looking at a non-balanced budget by fiscal year 1984, pressure will be put on for more cost savings in our programs.

Q What do you feel are the other major changes for food stamps under the Reconciliation Act?

A The other changes are not significant policy changes. They are changes designed to reduce the expenditures and moderate the growth of the program. The same basic provisions exist but we are tinkering with them to hold down costs.

The changes we are talking about drop higher income eligible households from the program—households whose income is 30 percent over the poverty line. We're also freezing the amount of deductions people can take and that affects how many food stamps they receive. The earnings disregard is lowered from the current 20 percent figure to 18 percent.

To some extent, everybody on the program will be getting something less than they would have been getting. We are moderating the growth of benefits so they won't be increasing as fast as they would have under the old law, which tied them more closely to cost of living changes.

Q Why is it so important to cut the costs of our programs? Do you really feel these cuts can affect the country's overall economic picture?

A Yes, I do. Even now, before spending cuts have taken effect, the Administration's economic policies are affecting the country. I would point out to you that inflation is below double digit right now. You should also note that unemployment, while still high, has not been growing by leaps and bounds.

There are a lot of factors. I don't want to suggest that they are all due to the Reagan policies. But there is a new confidence in the private sector; a new awareness and recognition that we are serious about reducing government's influence in the lives of businesses and individuals. This can have profound psychological impacts on how people behave. To some extent, because people have confidence things are going to improve, they do improve. At the same time, there remain some difficult unanswered questions.

This is a difficult time for economic theory. It's also a very exciting time to be in government, particularly in policy development. It is a new experiment. There are some risks involved in all this. And, yes, there are some non-believers, and I'm sure there will continue to be non-believers. But we really don't know yet. All I can say to you is the initial reaction of the public and the economy has been good. The real test will be a year from now when cuts start taking effect.

Q The Food Stamp Program seems to be in a state of constant legislative change. Certainly many people who administer the program feel they have barely mastered one system before all the rules of the game change again. If the Food Stamp Program is headed for some kind of consolidation with other welfare programs on down the line, how seriously do you think states will take our current efforts to improve the program's management and accountability?

A Let me respond in two ways. Number one, the changes we are talking about this year are not really major in terms of additional work load on the states.

When I took this position I argued very vehemently that I did not want major program changes. What I was looking for were parameter changes—delaying the Thrifty Food Plan, freezing the deductions. Those changes do not require a great deal of additional administrative regulation or staff time. They are simply changes in the existing program. Monthly reporting, retrospective accounting—those are major administrative changes—but we've been moving in that direction for quite some time now.

Number two, I would argue, whatever the future of the Food Stamp Program in this country, there are still going to be 50 states responsible for administering assistance programs. There will still probably be a work test. There will still be a basic assistance standard with some general formula for determining benefits. There will still be a filing unit. It's to the states' advantage to run these programs well, because these programs are going to continue to be their responsibility.

As an example. If it really were to come to pass that there was something like an AFDC-food stamp block grant—if that really were to happen—and the money was given to the states, the states would want to design their own welfare programs.

Certainly, one of the best ways of designing such a program is to take what they already have in existence. They may want a monthly reporting, retrospective income system. They may want filing units that provide additional benefits for the elderly, blind, and disabled. But at least a basic system has already been put in place.

I want to emphasize again, I do not want a lot of legislative changes in the Food Stamp Program. I would like to try to moderate that.

One part of what we are trying to do now—and I keep saying this but it never seems to get the attention it deserves—is that we are working hard to simplify and coordinate regulatory requirements between programs like food stamps and AFDC.

We are continually trying with such things as workfare, income eligibility standards, and definitions of income to bring the major income assistance programs in line. The biggest problem that states have is the inconsistencies in regulations between federal programs designed to serve the same population.

I keep harping on it, but look at AFDC and food stamps. There are terrible inconsistencies in the regulations. The unfortunate fact is, and states realize this but have to be reminded continually, these are two separate programs.

They are statutorily defined differently by different committees of Congress. They are regulated and administered differently by different federal agencies. Because of that, we here in this agency have to work very hard with our counterparts in the Department of Health and Human Services—where we have the flexibility and the statutes don't tie our hands—to try to make the programs as consistent as possible, to try to simplify administration.

To the degree these inconsistencies exist, the critics of eliminating AFDC and food stamps and block-granting the two are on real shaky ground. Maybe the only solution to solving the inconsistencies between the two programs is a consolidation.

Q How serious are state staffing problems? While current legislative changes aren't major, many states feel they are already over their heads with administrative burdens.

A I think this is a major issue. I think there is a serious need to evaluate the regulations we now have on the books.

The past Administration took liberty to require certain activities that are not necessarily statutorily required of the states. Regulations were written to deal with the worst case situations. That degree of specificity is not necessary.

If we are to work with the states, we may want to remove and back off from a number of requirements. The direction I want to head, and have been heading, is one of having a basic standard of performance.

In other words, we say to the states, "You shall have an error rate that is below such and such." Then we would hold the states liable for anything that exceeds that error rate. But then leave it alone. Let them determine what the best mechanism is for meeting that. Back off of management evaluation, certain performance standard requirements, state staffing requirements.

States know that they are to be held accountable for a particular performance, and if they do not perform they will receive a sanction from the federal government. They can either take the sanction and pay the federal government for their failure to perform, or they can modify their state operational procedures deciding what the best mechanisms are to meet the required performance standards.

I think we do have a major role to play in the regulatory review process, to modify existing regulations and to give as much flexibility to the states as possible. But at the same time, we will be holding their feet to the fire. There is a basic performance standard that they have to meet.

Q As far as child nutrition, do you feel the changes in the programs under reconciliation indicate a major policy shift? Historically, does this say we are heading somewhere new?

A Yes, there is a major change in policy going on in the child nutrition programs.

The basic issue was addressed in the Administration's March budget proposal and will continue to be addressed. That issue, of course, is the question of federal subsidies to school food programs serving non-needy children—children from middle and upper income families.

We proposed completely eliminating that subsidy. What happened under the reconciliation bill was that the subsidy was cut in half. But I expect that in the 1983 and '84 budgets, we will continue to try to cut the cash subsidy for meals served to non-needy children.

At the same time, I would hope we are able to carefully assess the impact of this cut. I don't think we have done a very good job of addressing the question—raised by many school food service people—concerning whether or not a cut in aid for non-needy children would financially force school food programs to drop out of our programs altogether and simply go it on their own.

I think this coming year we need to carefully monitor the effects of the cut in the food money we are providing to schools. We need to work out a safety net provision so we can maintain the programs while we are also moving them in the direction of reducing the money we provide to non-needy children.



Q Do you see the possibility of cuts in commodities that are now being distributed to school food programs?

A No. This is part of the beauty of these programs and the reason why they are in the Department of Agriculture—they also serve the broad agricultural policy in this country supporting farm income.

One of the original reasons we established a school food program was because it was a natural outlet for surplus foods. Purchasing and distributing surplus foods will continue to be a function of this Department, and these foods will continue to be sent to schools. And when the food gets to the schools, it doesn't matter whether it's served to needy or non-needy children—what matters is that the foods are being purchased and distributed and supporting the farm sector.

We have a strong commitment to the commodities program, and schools can continue to count on receiving commodities.

Q Do you feel there is too much duplication among the child nutrition programs? Do you see the possibility of a block grant approach being applied here?

A First of all, one could argue that there is not as much duplication and overlap as would first appear.

The programs are targeted on different groups. There are the school programs that are oriented toward breakfast and lunch. Those programs will continue and are not duplicative. Then there are what I refer to as the pre-school/after-school programs—the child care food program, the family day care food program. And there is a major set of programs which I call the “even before you're born” programs—WIC and the commodity supplemental food program.

These programs virtually cover the child from conception to high school graduation. The programs are designed to meet the varying nutritional needs of the child along this entire spectrum.

There are some areas that seem to me to be possibilities for consolidation, but I certainly don't see all of these programs being consolidated into one.

I do see possibilities of modifications to the child care program and family day care program. We might tell the states how much money they have and let them determine whether it goes to centers or family day care. At this particular moment, I am seriously considering—and we will be studying—that possibility. But beyond that I do not think our programs would fit into a broad block grant for nutrition assistance.

Q How effective are we in communicating from the federal to the state to the local level? To what extent, do you think, do we speak in a jargon that others can't understand? How much are our messages misunderstood as they are passed along?

A When you are dealing with programs as big as these, there are bound to be problems. There is no way you can get around this. These are expansive programs.

I'm trying hard myself to make sure that we are talking with all the concerned groups. I attended the American School Food Service Association's annual meeting as well as the American Public Welfare Association meeting. I'm pleased with our initial efforts to open up the channels of communication.

Obviously, various interest groups do not always agree with our announced policies, but at least we aren't holding anything back from them. I think they appreciate our willingness to discuss the issues openly.

I think that bureaucracies have a tendency to set up barriers to communication. The existing hierarchical structure of agencies does not always lend itself very well to communications.

The real future of improving communications, from my perspective, is an open dialogue between people—whether those people are recipients, workers, or managers.

I have a sense that the nature of the civil service is to be anti-communication. Because of that, I think we have a major responsibility right here in our own backyard. We need to improve our communications as a staff. We need to be receptive to comments from state and local people. And we need to let them know why we don't agree with them when we have differences.

But it is really a new structure, a new system of communications that we need to try. The old systems have been in effect far too long and have not really provided for effective communication.

Q You have worked with federal food programs for years. Your interest keyed off of your exposure to the realities of hunger and poverty in Haiti. Given your background, do you find it difficult to support the changes the programs are facing?

A I have a strong belief that I can have an effect here. I can defend what has been done to date. I can see a real need for what we've done, and I want to continue that work.

There's an educational role to be played between myself and my bosses. And I will continue to work and to speak out for what I believe. There needs to be direction given in federal policies related to feeding low-income families and children—especially during this time of budgetary constraints.

The Reagan Administration—and I sincerely believe this—is a compassionate Administration. It is still interested in providing assistance to those who need assistance. It continues to believe the best policy for assisting low-income groups is a reduction in dependency provided through a growing national economy.

The Administration is interested in cooperative federal, state, and local systems for assisting low-income groups. It is interested in state and local flexibility. It is interested in de-regulation. It is interested in simplifying the administration of these programs.

I feel there is plenty of room for improvement in our programs. If we are to protect these programs in the future, we have to improve them. Otherwise we will be subject to serious criticism and the possible elimination of the programs completely. If we don't take this opportunity to work very hard to improve the management of these programs and provide the flexibility state and local people have wanted, then we might as well throw in the towel. And I'm not ready to do that.

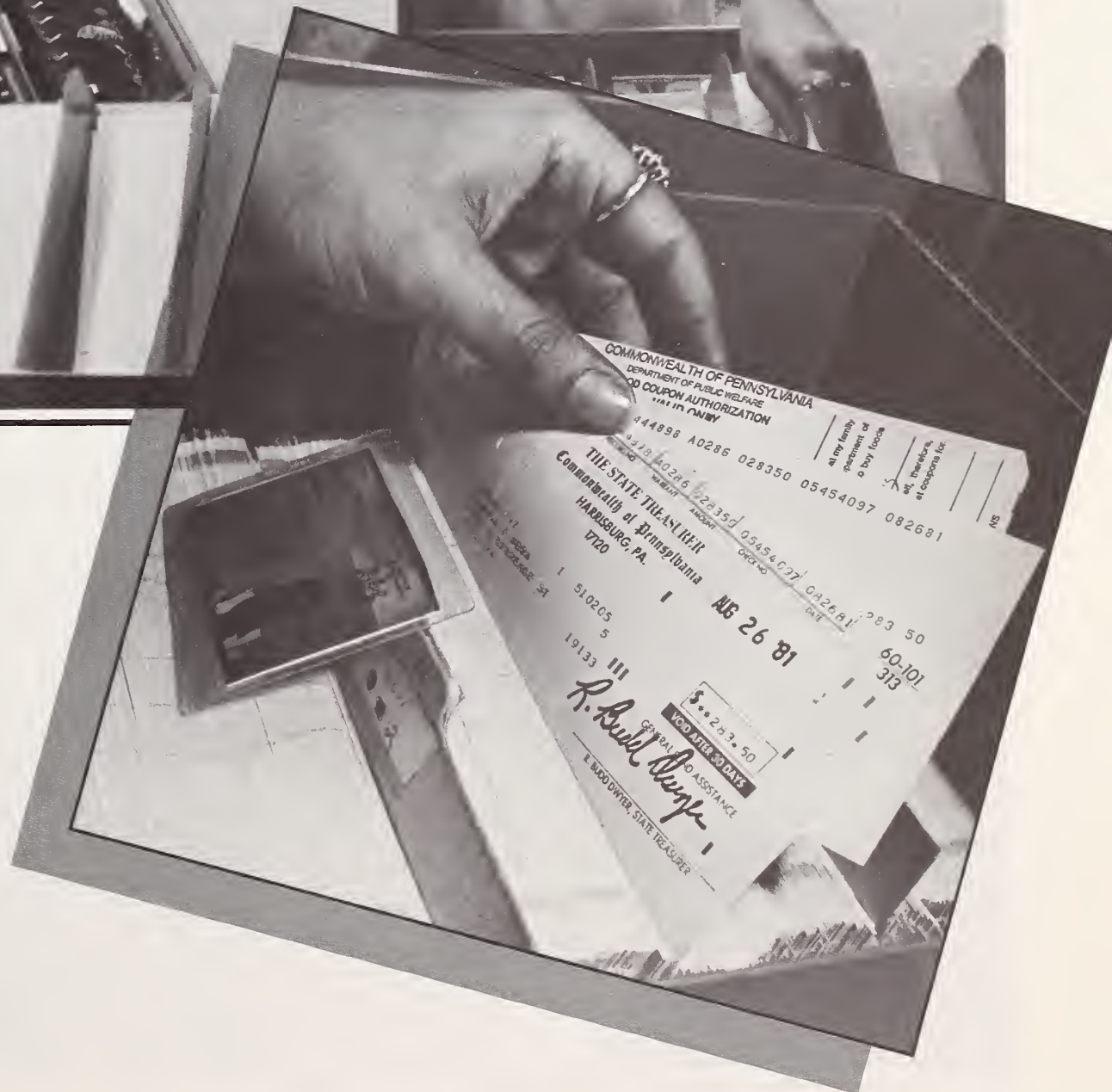
*article by Diane Durant
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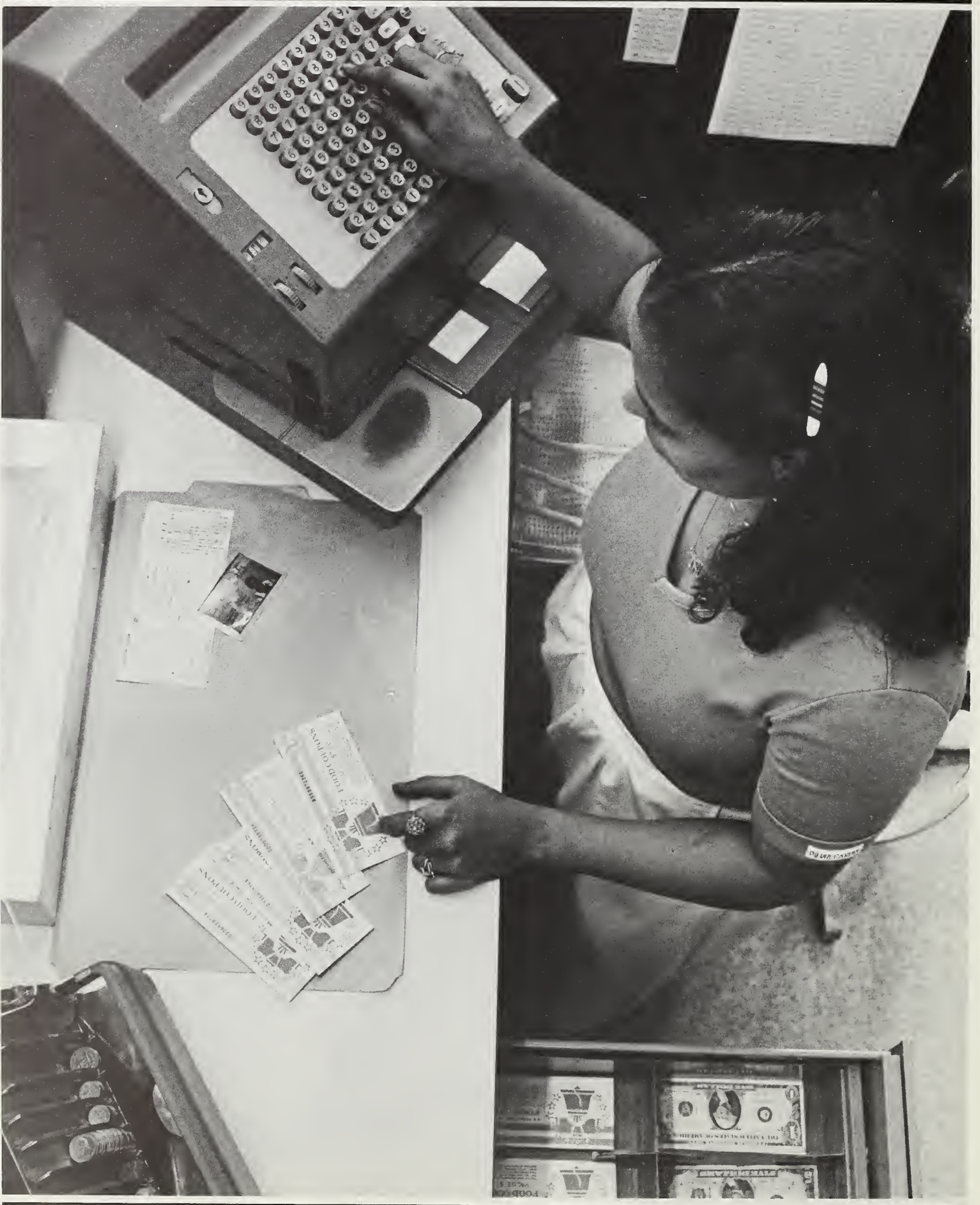


PENNSYLVANIA'S DIRECT DELIVERY PROJECT

Pennsylvania has adopted a new food stamp issuance system in Pittsburgh and Philadelphia. Food stamp participants no longer have to wait for the mailman to deliver their authorization-to-participate (ATP) cards, and officials are pleased with the savings realized since they stopped sending the cards through the mail.

The authorization-to-participate card is a check-like card that lists the amount of stamps the food stamp participant is allotted for a





month. Every participant gets an ATP card each month.

Under Pennsylvania's new system, begun as a test, the state welfare office delivers the ATP cards to designated outlets (usually banks) instead of mailing the cards to recipients. This resulted in a savings of \$38,440 a month during the first 6 months of operation, September 1980 to February 1981. Most of the savings were due to drastic reductions in the number of ATP cards that had to be replaced because of loss or theft.

Not only is direct delivery cost effective, but food stamp users feel it is an efficient system. In a survey conducted among direct delivery participants, more than 60 percent reported that they had not been receiving their ATP cards on time through the mail. Ninety-one percent indicated that with direct delivery, they received their cards on time. And 80 percent thought the system was more convenient than the mailing system.

Why the system was started

Before direct delivery began, several districts in Philadelphia and Pittsburgh experienced a steady rise in duplicate issuances under the mailing system. These duplicate issuances were caused by theft or loss of the cards in the mail. In some cases, recipients fraudulently reported their original ATP cards as non-delivered, lost or stolen and received a replacement before the state could ascertain the legitimacy of the replacement request. The number of replacements reached 2,800 (worth \$210,000) a month in October 1979 in Philadelphia County.

Department of Agriculture and state officials decided a system was needed to preclude the mailing of ATP cards to recipients and, thereby, reduce or eliminate the rising number of duplicate issuances.

In September 1980, USDA awarded Pennsylvania a \$102,000 grant

to implement a direct delivery demonstration project in one district in Pittsburgh and parts of three districts in Philadelphia.

The food stamp delivery project is piggybacked onto the Pennsylvania public assistance issuance system. Each month the state welfare department delivers public assistance checks to designated banks and their subsidiaries. Public assistance recipients go to their assigned banks, present both their public assistance and food stamp photo identification cards, sign the public assistance check and ATP card. The check is cashed and the recipient is given his or her food stamp allotment.

The signed ATP card is placed on file and kept for the rest of the month. If a recipient comes in and requests additional benefits, the teller is able to verify if the recipient's monthly benefits were issued. Banks get a transaction fee for each ATP card they issue.

Presently, most public assistance recipients are required to get their food stamp benefits through the direct delivery system. In addition, food stamp recipients who do not receive public assistance are required to get their food stamps through the new system if they have a history of requesting replacements of ATP cards. Other non-public assistance participants in Philadelphia and Pittsburgh may select either mail issuance or direct delivery.

Officials see many advantages

"The new system provides recipients with one-step shopping," says Ed Larkin, who oversees the direct delivery project in Pennsylvania's Department of Public Welfare.

"The recipient does not have to worry about the public assistance check or ATP card being stolen or lost in the mail or the possibility of one or both arriving late," he said. "They know their checks and ATP cards will be at the bank on the designated day. Business such as purchasing money orders and making utility bill payments can also

be done in that one trip to the bank."

Pennsylvania has adopted the direct delivery system on a permanent basis for Philadelphia and Pittsburgh and plans to have the system operating in all districts of the two cities this fall. Of the approximately 468,000 food stamp households in Pennsylvania, 125,000 currently receive their food stamps through direct delivery.

A lot of time, effort and coordination makes this project work, state officials assert. "The only disadvantage is it increases the time the recipient must spend at the teller window transacting business. Consequently the lines are a little longer," says Larkin.

"But," he adds, "everyone seems to think the additional few minutes are worth the convenience. I strongly recommend it for urban areas where there are high incidences of duplicate issuances."

Other areas are looking for similar solutions to the problem of duplicate issuances of ATP cards. Kentucky is gearing up to start a direct delivery system late this year or early next year.

For more information on Pennsylvania's direct delivery system, write:

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*article by Marilyn Stackhouse
photos by James J. Craig*

USDA STUDIES THE COMMODITY SYSTEM

This fall USDA will begin a demonstration project in 90 schools nationwide to examine the current method and two alternative methods of donating agricultural commodities to the National School Lunch Program.

The study is being done to evaluate various cost effective ways of improving the commodity program. In addition, legislation passed in 1981 requires USDA to examine alternatives to the present system.

One alternative, cash-in-lieu of commodities, will provide 30 schools with cash equal to the value of the commodities to which they would have been entitled under the present commodity donation system.

The second alternative will give another 30 schools commodity letters-of-credit allowing them to purchase specific food items from local sources. Again, the commodity letter-of-credit will be provided in place of donated commodities.

An additional 30 schools will serve as control sites and will continue to operate under current regulations of the commodity donation program.

According to Ronald Vogel, of the Food and Nutrition Service's policy, planning and evaluation staff, the study will examine:

- the cost effectiveness of the two alternatives;
- their impact on school food procurement patterns;
- their effects on school lunch quality and lunch program participation;
- their impacts on government price support and surplus removal programs; and
- their administrative feasibility.

Schools chosen as demonstration project sites will participate for 4 school years, beginning September 1981. The demonstration projects will be evaluated during the first 3 years, and USDA will report to Congress by December 1984.

How commodity donations evolved


In 1935, Congress passed legislation to remove surplus foods from the market through government purchase, and dispose of them through exports and domestic donations to consumers in such a way as not to interfere with normal sales. Needy families and the

school lunch program became logical outlets for the commodities, and farmers benefited by obtaining an outlet for their products at a reasonable price.

From 1935 to 1970, over half the food distributed domestically went to needy families. However, due to expansion of the Food Stamp Program and a corresponding decrease in donations of food to needy families, schools and child feeding programs have used an ever-increasing share of the total food distributed.

Schools obtain roughly 20 percent of the food they use from the Food Distribution Program and





purchase the remaining 80 percent locally. However, the 20 percent distributed to schools represents over 86 percent of the food acquired under national surplus removal and price support programs.

Why look for alternatives?

The study will examine the effectiveness of the current system and the advantages and disadvantages of the two alternatives.

One consideration will be cost. "Currently," says Vogel, "the government pays for shipping the commodities to states, although the states incur the costs for warehousing and shipping the products to local school districts."

With the alternatives, there are no shipping costs for the government. Schools arrange for delivery of the foods themselves.

Another consideration is local autonomy in placing orders and arranging shipment and delivery schedules. Currently, flexibility to meet specialized local needs is somewhat limited because USDA must consolidate orders from all states, purchase the commodities, and arrange for transportation to the states.

Because USDA must consolidate orders, the Department cannot always purchase the exact items individual schools want. Advocates of the letter-of-credit and cash alternatives argue that these alternatives would give schools more flexibility of choice and that schools would probably buy in larger amounts.

Advantages of current system

Although there are valid reasons for considering alternatives to commodity donations, there are equally valid arguments for maintaining

the present system.

"The strongest argument for continuing food distribution is to carry out the original intent of the program—that of surplus removal," says Vogel. "Allowing local school districts to use cash to buy food may not sufficiently meet the objectives of price support and surplus removal. Also, the school lunch program could no longer serve as an outlet for food acquired through the Department's surplus removal and price support programs."

Another advantage to the commodity program is the federal government's ability to buy in large volumes. "Since the Department buys in such quantity, it generally gets a better price," Vogel explains. "Small school districts buying independently could not hope to get as much food for the same money."

And if part of the intent of the alternatives is to remove government control in commodity buying, then a system of letters of credit would not entirely fit the bill. "Letters of credit would still impose some re-

strictions on states," Vogel says, "because schools would only be allowed to purchase specific items with letters of credit."

Because USDA would still need to target school purchases to meet certain surplus removal and price support considerations, the Department would specify items to be purchased with the commodity letters-of-credit.

With strong arguments on both sides of the commodity donation question, the Department hopes that the demonstration project will yield valuable information resulting in either faster, more efficient methods of commodity donations, or perhaps a complete revamping of the current system.

For more information, write:

Office of Policy, Planning
and Evaluation
Food and Nutrition Service
U.S. Department of Agriculture
Washington, D.C. 20250

by Carolyn Williams



WIC ON THE STANDING ROCK RESERVATION



In our August 1980 issue, we reported on how three Indian reservations — one in southwest Colorado and two in northern Minnesota — were operating their own food distribution programs. In the article that follows, we look at how a reservation in North and South Dakota is operating the Special Supplemental Food Program for Women, Infants, and Children, commonly known as WIC.

The Standing Rock Sioux Reservation is one of 29 Indian tribes or reservations currently operating as state agencies for WIC. As state agencies, they oversee all aspects of WIC operations and

work directly with USDA's Food and Nutrition Service (FNS), which administers the program nationally.

The WIC program serves: pregnant, breastfeeding and postpartum women; infants; and children up to age 5. To be eligible, mothers and children must be at nutritional risk because of health problems or poor diet, and they must have low incomes.

WIC participants receive individually prescribed packages of foods high in protein, iron, calcium, vitamin A and vitamin C. Depending on the nutritional needs of the mother or child, the package may include such foods as

iron-fortified cereal, juice, eggs, milk or cheese, fortified infant formula and peanut butter or dried peas or beans. Participants also receive nutrition education.

Tribes or reservations serving as state WIC agencies authorize food stores to accept WIC food vouchers in exchange for specified items. They pay stores for redeemed vouchers, using funds from FNS. The majority of tribes or reservations work closely with the Indian Health Service and other local health agencies to arrange for certification and nutrition education.

The Standing Rock Sioux Reservation, in just the last couple of years, has developed one of the most successful tribe-operated WIC programs in the Mountain Plains Region.

WIC was first made available to North and South Dakota, the states in which Standing Rock is located, during the early 1970's. However, only when Standing Rock was granted WIC state agency status in 1978 did the program begin to meet the needs of people on the reservation.

WIC serves low-income mothers and children who are nutritionally at risk, and in a place like Standing Rock Reservation, the value of such assistance is thrown into stark and ominous relief. For many participants here, WIC benefits can truly mean the difference between life and death. The land, the climate, economic and domestic instability, and health problems all pose severe threats to the well-being of a Sioux mother and her baby.

Consider the land

The Standing Rock Sioux Reservation, established in 1873, comprises a tremendous area, roughly 2.5 million acres straddling the border between North and South Dakota. As vast as it is, it contains a population of only 10,000 people, and only 6,000 of them are Sioux. Roughly a third of the reservation land is owned by either individual Sioux or by the tribe.

Ft. Yates, North Dakota, the main town on the reservation and seat of the tribal government, is situated on the recently created Oahe Reservoir, a dammed section of the Missouri River. Copses of bleached, dead tree trunks stand in shallow water, evidence of former river boundaries and of scarce wildlife refuges made scarcer still. In every direction, the soft brown tundra-like terrain rolls away to the horizon uninterrupted. Other towns are few and very far between.

The land has a strange, desolate beauty, but all that open space can become suddenly treacherous when the temperature plummets and the wind begins to roar. Each winter

the local newspaper carries reports of Indians who have died from exposure to the cold. Malnourished infants and young children are especially vulnerable, and as recently as 1976, the infant mortality rate among Standing Rock Sioux averaged 36 percent.

Economics pose other hazards

The Standing Rock Sioux are extremely poor. One estimate puts their unemployment rate at about 90 percent and annual per capita income at \$679. Even with adequate housing, many tribe members have neither car nor phone. They are isolated and dependent upon relatives, friends, and tribal services for transportation and communication.

Radical changes in family structure have caused additional problems for Sioux mothers and their children. Approximately 45 percent of all Standing Rock Indian children are born to unmarried women, and more than a third of all households are headed by females. While the Sioux often still live together in "extended" family groups that may include several generations and numerous relatives, these groups are quite fluid. Their members come and go. Sometimes, for instance, WIC workers have difficulty locating a mother and her child from one month to the next because they move so frequently.

If domestic and economic instability are two serious threats to the tribe's mothers and children, so is malnutrition. The Standing Rock Sioux resemble other tribes in their predilection for fried and starchy foods. Like the Ute Mountain Utes of southwestern Colorado, for instance, the Sioux of the northern plains have made fried bread a staple of their diet. They have gravitated to foods that are cheap, plentiful, and convenient, but not necessarily nutritionally adequate.

The Sioux suffer from an array of health disorders, many of which are associated with malnutrition: obesity, diabetes, anemia, and hypertension. Before WIC began to have measurable impact, two-thirds

of the tribe's children ages 1-5 were anemic. Almost 42 percent of the mothers were overweight. Almost 60 percent of all pregnancies were high risk, and many were complicated by alcoholism.

WIC program targets aid

Although the food stamp and commodity distribution programs have helped significantly to correct dietary imbalances within the Sioux community, there remain specific problems relating to pregnancy and childbearing that are treated most effectively through WIC. WIC focuses special attention on pregnant women and infants to minimize the risks they face.



IRENE LAWRENCE

Since its inception at Standing Rock in 1978, the WIC program has made progress, but WIC director Irene Lawrence admits that it was a bit shaky at first.

"It took us a long time to gain their trust," says Lawrence, "but now the WIC program has come into its own." Roughly 1,200 to 1,500 Sioux women and children are eligible for WIC. Almost 1,000 of them actually receive benefits at any one time.

The reasons for the Standing Rock WIC program's success are threefold: a dedicated and respected staff, a well-coordinated method of delivering services, and active efforts to locate women and children in need of WIC services.

In addition to Lawrence, the WIC

staff includes: health officer and former physician's assistant Tim Yellow; secretary Flora Star; nutritionist Dawn Braaten; and outreach worker Darlene Medicine Horse. All are tribe members except Braaten, who joined the program over a year ago.

With the help of their clerical staff, this group locates and certifies eligible women and children. They issue food vouchers to participants each month—sometimes as many as 2,500 to 3,000 individual vouchers, one for each of several purchases during the month. They also keep rigorous, detailed records of participants' health, including growth charts, 24-hour dietary recall forms (for monitoring diet) and prenatal grids which track a mother's weight gain during her pregnancy.

Another of the staff's responsibilities is to monitor food stores

and make sure they are stocking the appropriate WIC foods. Standing Rock has authorized 10 food stores to accept WIC vouchers in exchange for specified foods. Seven of the food stores are on the reservation.

Approach is personal

The close-knit character of the Sioux community strongly influences the delivery of WIC services on the Standing Rock Reservation. Because most of the staff are tribe members and intimately familiar with the community, their professional relationship to WIC mothers and children is based on strong personal ties.

Often, staff members are approached by program participants for advice and assistance with problems that appear to have little to do with WIC. Discussion of eating habits and health status is intermingled with talk about domestic troubles and transportation difficulties.

Health officer Tim Yellow, an especially popular counselor, says laughingly, "Don't be surprised if you hear someone call me Dr. Yellow!" Having grown up on the reservation, he knows almost everyone in the tribe, and everyone knows him. Tribe members appreciate his ability to listen and constantly seek his advice.

"The Sioux treat all of life as an interconnected whole," Yellow says. "They don't separate one aspect or one part of their life from another." By helping to solve a personal crisis, a WIC staff member enables a participant to benefit fully from WIC's more tangible offering.

Clinics at six sites

To reach WIC participants and others who may be eligible, the staff conduct clinics at six sites around the reservation, in five of the seven districts: Ft. Yates and Cannonball in North Dakota; Bullhead, Little Eagle, McLaughlin, and Wakpala in South Dakota. Clinics are held once a month at all sites except the more populous Ft. Yates and McLaughlin sites, where they occur twice monthly. At the clinics, the WIC staff certify participants,

issue food vouchers, check individual diet and growth data, and provide nutrition education.

Dawn Braaten, the nutritionist, conducts the nutrition education portion of the program in conjunction with certification. Because of logistical problems, it is difficult to assemble WIC participants in one place on a regular basis for conventional classroom instruction.

Instead, Braaten gives individual instruction at each certification meeting. This requires considerably more work, but it is much more personalized and effective. The main subjects she covers include breastfeeding (stressed heavily), fetal alcohol syndrome, anemia, proper use of formulas, child development, and the basic food groups.

The response to the personalized instruction has been positive, and the emphasis on breastfeeding seems to be paying off. When the WIC program began, only one woman was breastfeeding. Now the figure is around 20 percent. This fall a consultant from Minnesota will be giving a workshop on breastfeeding for both WIC mothers and health professionals.

Braaten looks to a variety of sources for nutrition education materials. She tries to get as much free material as she can, and she finds county extension home economists especially helpful. She also gets free material and rental films from the North Dakota state WIC office and the state maternal/child health office.

In a quite novel nutrition education project last year, Braaten distributed garden seeds to WIC participants and encouraged them to grow their own vegetables. At the end of the growing season, she conducted seminars on canning and other preserving methods. The seeds were purchased with a grant from the Community Services Administration.

Work with other agencies

The WIC program staff work closely with other social service and health agencies on the reservation. Braaten, for example, has given workshops for Indian health professionals. Topics have ranged

TIM YELLOW



DAWN BRAATEN



PAT BLOOM

from breastfeeding to fetal alcohol syndrome.

Standing Rock clinics coordinate their services with the Maternal/Child Health clinics conducted by Pat Bloom, a nurse practitioner for the Indian Health Service. The arrangement struck by these two programs is a model of efficient, cooperative planning. Everywhere WIC goes, Bloom goes. At the same time she examines the general health of mothers and children and administers immunizations for IHS, she makes specific checks relating to WIC certification, such as blood analysis and height and weight measurement.

According to Irene Lawrence, Pat Bloom makes a personal and important contribution to the WIC

clinics. Her dedication is inexhaustible, says Lawrence: "In some places, people are turned away if they are late for an appointment. I have never heard of Patsy turning anyone away. . ."

To help Pat Bloom, North Dakota's Maternal and Child Health Program recently provided funding for a nurse, Dan Chaussee—another example of inter-agency cooperation. Chaussee now screens all infants and children at the WIC clinics, teaches prenatal classes in each reservation community, and makes home visits to new infants and high-risk children. His services allow Bloom to spend more time with prenatal and postpartum women.

Another cooperative effort exists

between the WIC staff and the tribe's community health representatives, called "CHRs." These women, dressed in their blue jackets, make rounds throughout the reservation, checking in on people who are housebound or requiring special attention. They provide an invaluable service to WIC by locating and visiting pregnant and postpartum mothers, providing transportation, and even occasionally delivering food vouchers. The CHRs provide a vital link between program staff and WIC participants.

Administrative complexity

One of the challenges the WIC staff at Standing Rock has to face is the administrative complexity of running the program there. In this time of budgetary constraints, the challenge becomes even greater.

Administrative funding for staffing the program and renting the office space comes from various sources. Three staffers are paid through WIC, and two are paid with funds from other government agencies. One of them is Dawn Braaten, who must divide her time between WIC and other tribal nutrition projects. In short, running the program requires considerable administrative dexterity.

A 3-year study of the Standing Rock WIC program was completed recently, and the results will be known later this fall. Preliminary results of the study, which focuses on problems of overweight in mothers and anemia in mothers and children, indicate improvement in both areas.

These improvements are largely due to the educational efforts of the WIC staff, according to study director Dr. Peter Chommie. "They are extremely committed and offer one of the better programs I've seen," he said.

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